

# **EXHIBIT E**



**CHICAGO DEPARTMENT OF TRANSPORTATION**  
**CITY OF CHICAGO**

August 14, 2024

Chicago Alliance Against Racist and Political Repression  
C/O Kobi Guillory  
6227 S Langley  
Chicago, IL 60637

Dear Kobi Guillory,

The City's Department of Transportation (CDOT) is in receipt of your applications submitted to the Chicago Park District for Park District special event permits to assemble in Park 578 and Union Park on August 19 and August 22, 2024. Pursuant to Right of Entry agreements between the Park District and the City, the City has been granted control and use of Park 578 and Union Park during the DNC to facilitate the City's efforts to accommodate First Amendment expression on those dates. Your applications were forwarded to CDOT for action.

Your requests to use Park 578 and the Field at Union Park for rallies on August 19 and August 22, 2024, as described in your applications to the Park District, are granted, subject to the following conditions: no stages or platforms, portable restrooms or toilets, tents or canopies, or sound equipment may be installed by your organization.

Union Park is being used as the assembly and disbanding point for a parade route that multiple groups may use near the United Center between August 19 and August 22. Union Park is also available for people or groups who wish to engage in First Amendment exercise during those dates without marching in a parade. Similarly, Park 578 is being used as part of the parade route that multiple groups may use between August 19 and August 22, and is also available for people or groups who wish to engage in First Amendment exercise during those days without marching in a parade. As both parks will be used by several different individuals or groups for these purposes, we cannot ensure that there will be sufficient time for set up and take down of equipment without infringing on other groups' use of the parks. In addition, installing the requested equipment will reduce the amount of space in the parks available to others who wish to use the parks for these purposes.

Moreover, from previous experience at Union Park, stages and sound systems have required vehicles to drive into the park for set up, as well as power/electricity. With the potential of large groups of people utilizing Union Park, from a public safety perspective it would be unsafe to allow vehicles to drive into the park. The City has requested bollards to block driveways and low curbs to prevent vehicles from being able to drive into Union Park. At Park 578, the City is already planning to set up one stage with sound amplification, so any additional set ups would be redundant



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and unnecessary, as well as reducing the amount of space in the park available to others wishing to use the park for First Amendment activity.

Additionally, the requested items present a public safety risk. For instance, tents or canopies can be used to conceal illicit activities from law enforcement and can obstruct law enforcement efforts to monitor large crowds in public to protect public safety. Moreover, the poles used to erect the tents/canopies have been used as weapons and used to conceal weapons that could be used against other persons or law enforcement officers. Regarding portable restrooms, these offer a space for concealment of weapons or unsanitary materials that can be used against other persons or law enforcement officers. They can also be used as a base from which to inflict mass casualties. They may also be broken down into pieces that can be used as weapons against other persons or law enforcement officers or used to repel law enforcement. They present a public safety risk as they cannot be monitored by the Chicago Police Department and are a potential threat to the safety of both law enforcement and persons attempting to utilize these parks to exercise their First Amendment rights. While CDOT is not suggesting that your particular group will use these items in these ways, their presence in the park could be abused by others to harm members of the public or law enforcement officers.

Finally, in addition to the above-requested rallies, your organization may use Park 578 and Union Park on August 19 and August 22 pursuant to any parade permit or access to the Park 578 speaker's platform granted by CDOT.

If you have any questions regarding this letter, you may contact Bryan Gallardo at 312-744-4652.

Sincerely,

Bryan Gallardo  
Assistant Commissioner  
Public Way Permit Office  
CDOT Division of Infrastructure Management

CC: Chief Devries  
Deputy Chief Stevens  
Cmdr. Giltmier  
J. Kalayil  
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